

IN THE DISTRICT COURT FOR MIDDLE TENNESSEE AT NASHVILLE

ROBERT Gordon

v

CASE #

MATTHEW HORTON

AND

ERIN MISHKIN

## RECEIVED

MAY 07 2025

US DISTRICT COURT  
MID DIST TENN

### COMPLAINT FOR DEFAMATION

PLAINTIFF, ROBERT C GORDON, IS A CITIZEN & RESIDENT OF TENNESSEE AND HAS BEEN FOR MORE THAN SIX MONTHS PRIOR TO FILING THIS COMPLAINT. THE ACTS COMPLAINED OF WHILE PUBLISHED ON THE INTERNET IN TENNESSEE AND AVAILABLE TO THE PUBLIC.

### ISSUES

THE DEFENDANTS HAVE PUBLISHED FALSE & MALICIOUS STATEMENTS TO THIRD PARTIES VIA COURT PLEADINGS. THE STATEMENTS WERE MADE WITH RECKLESS DISREGARD FOR THE TRUTH AND DEFAMING TO PLAINTIFF

SPECIFICALLY, ON APRIL 7<sup>th</sup> 2025 THE DEFENDANT FABRICATED PHOTOS OF AN ALLEGED ASSAULT WHILE STATING "MS. MISHKIN ENDURED BEING DRAGGED THROUGH HER HOME BY HER HUSBAND, BRIAN" "PENCHED, KICKED, CHOKE, SMOTHERED, AND SEXUALLY ASSAULTED" (EXHIBIT A)

(1)

ON MARCH 21, 2025 THE DEFENDANTS STATED, "PLAINTIFF WAS PHYSICALLY VIOLENT WITH MS MISHKIN. I ATTACHED ! THREATS TO HER LIFE AND SAFETY. AND SEXUALLY ASSAULTED (EXHIBIT B)

ADDITIONALLY, IN AN ATTEMPT TO SIDE STEP A SUBPOENA ! CONCEAL THE BRAVO OF ERIN MISHKIN, THE DEFENDANTS CONTACTED OVER 30 WITNESSES IN RECEIPT OF SUBPOENAS DEMANDING INDIVIDUALS REEVAN FROM COMPLYING WITH COURT ORDERED SUBPOENAS. (EXHIBIT C)

### FACTS

DEFENDANT, ERIN MISHKIN, WAS ARRESTED ON 10/8/22 FOR ASSAULTING PLAINTIFF, HITTING THE PLAINTIFF WITH A CAR WHILE DRUNK WITH HER SMALL CHILD IN THE CAR. ERIN MISHKIN SIGNED A PLEA DEAL ON 10/31/22 AND THE STATE WAS FORCED TO REMOVE HER CHILDREN AFTER BEING CAUGHT BY A PRIVATE INVESTIGATOR DRINKING BEER ON THE WAY TO SCHOOL ! FORCING HER CHILDREN TO BLOW INTO THE "INTOX-ALOCK."

DURING HER PROBATIONARY PERIOD, ERIN MISHKIN FALSIFIED GOVERNMENT RECORDS WHILE FORGING THE SIGNATURE OF HONORABLE JUDGE TOM TAYLOR, WILLIAMSON COUNTY CLERK,

AND HER FORMER COUNSEL, JONATHAN TURNER, WHO WAS FORCED TO WITHDRAW DUE TO THE FORGERY BY HIS CLIENT.

MISHKIN HAS FILED A LITANY OF RETALIATORY FALSE REPORTS TO INJURE, DEFAME THE PLAINTIFF AFTER HER ARREST.

MISHKIN WAS FORCED INTO ALCOHOL REHAB WHILE PREGNANT FOR EATING SANITIZER WHILE ATTEMPTING TO KILL HER UNBORN CHILD.

AS A DIAGNOSED PSYCHIATRIC PATENT, MISHKIN HAS AN EXTENSIVE HISTORY OF CRIMINAL ACTIVITY INCLUDING EVILULENT USE OF FOOD STAMPS, A 2019 RAPE INCIDENT OF DAVID MISHKIN, IDENTITY THEFT OF A MINISTER, CRIMINAL IMPERSONATION OF A MINISTER FROM "HOLY TRINITY LUTHERAN CHURCH", MAIL FRAUD, TAX FRAUD, WINE FRAUD, AND OF COURSE PERJURY.

DEFENDANT MATTHEW HORTON PUBLISHED FALSE, MISLEADING, AND MALICIOUS STATEMENTS ABOUT PLAINTIFF IN AN ATTEMPT TO CONCEAL PRIOR, ON-GOING FRAUD, BY HIS CLIENT. BY DOING SO MR HORTON IS FACILITATING THE FURTHERANCE OF A CRIME ( FRAUD) EVIDENCED BY HIS LETTERS TO WITNESSES ATTEMPTING TO CIRCUMVENT THE RULES OF CIVIL PROCEDURE ( THE POWER OF THE COURT.

REPUTATION & CHARACTER

PLAINTIFF IS A 40 YEAR OLD CORPORATE EXECUTIVE AT IBM LEAVING THE AMERICAS CONSULTING PRACTICE. HE HOLDS GRADUATE DEGREES FROM STANFORD, YALE, AND MIT, RECEIVED HIS UNDERGRADUATE DEGREE IN MASS COMMUNICATION GRADUATING MAGNA CUM LAUDE & EARNED HIS MBA FROM FORT HANS STATE UNIVERSITY.

PLAINTIFF HAS NO CRIMINAL HISTORY, NO TROUBLED PAST, AND WAS NAMED IBM'S CONSULTING PRACTICE EMPLOYEE OF THE YEAR IN 2022 & BECAME PARTNER IN THE FIRM IN 2023. ADDITIONALLY, PLAINTIFF IS OWNER OF THE GORDON GROUP LLC CONSULTING & PRIVATE EQUITY FIRM.

ELEMENTS OF DEFAMATION

TO ESTABLISH A PRIMA FACIE CASE FOR DEFAMATION THE PLAINTIFF MUST PROVE (1) THE PARTY PUBLISHED A STATEMENT (2) WITH KNOWLEDGE THE STATEMENT WAS FALSE & DEFAMING TO THE OTHER OR (3) WITH RECKLESS DISREGARD FOR THE TRUTH OF THE STATEMENT OR WITH NEGLIGENCE IN FAILING TO ASCERTAIN THE TRUTH OF THE STATEMENT (SULLIVAN V BAPTIST MEM' L HOSP, 995 SW 2d 569, 571 TENN 1999)

(4)

ELEMENTS APPLIED

(1) THE DEFENDANTS PUBLISHED STATEMENTS INTO THE PUBLIC BY WAY OF COURT PLEADINGS (2) THE DEFENDANTS KNEW STATEMENTS WERE FALSE { MADE TO DEFAME THE PLAINTIFF. DEFENDANTS ALLEGÉ MULTIPLE VIOLENT ACTS WITH NO PROOF { FABRICATED INJURIOUS PHOTOS ALL IN AN ATTEMPT TO CONCEAL ERIN MISHKIN'S FRAUD.

(3) THE DEFENDANTS MADE STATEMENTS WITH RECKLESS DISREGARD FOR THE TRUTH { NEGLECTED TO ASCERTAIN THE TRUTH SPECIFICALLY THE EGREGIOUS CLAIMS OF SEXUAL ASSAULT

THE NEVUS LIES WITHIN THE KNOWLEDGE THEIR STATEMENTS WERE FALSE, DEFAMOUS, AND PUBLISHED WITH RECKLESS DISREGARD FOR THE TRUTH, MEANWHILE, ATTEMPTING TO CONCEAL ERIN MISHKIN'S FRAUD { DIVERT ATTENTION FROM HER CRIMINAL ACTS

THE BASIS FOR AN ACTION FOR DEFAMATION IS THAT THE DEFAMATION HAS RESULTED IN AN INJURY TO THE PERSON'S CHARACTER { REPUTATION. THE DEFAMATORY STATEMENT MUST "CONSTITUTE A SERIOUS THREAT TO PLAINTIFF'S REPUTATION" (STONES RIVERZ MOTORS INC v MID-SOUTH PUB'L CO 651 S.W.2d 713 TN APP 1983)

(5)

DAMAGES INJURY

PLAINTIFF'S PUBLIC REPUTATION IS INJURED BY THESE ON-GOING CHARACTER ASSASSINATION ATTEMPTS AND FALSE MALICIOUS STATEMENTS. THE DEFENDANTS HAVE NO EVIDENCE TO SUPPORT THEIR CLAIM, BLATANTLY LIED, ! WERE NEGLENT TO ASCERTAIN THE TRUTH. THEIR DILIGENT INDIFFERENCE OR EVEN RECKLESS DISREGARD FOR THE TRUTH HAS RUINED THE PLAINTIFF'S DIGNITY CALLING EMOTIONAL DISTRESS. IN ADDITION, THESE FALSE ACCUSATIONS HAVE CAUSED GREAT DAMAGE TO PLAINTIFF'S BUSINESS ! PROFESSIONAL CAREER. THUS, HINDERING THE LIKELIHOOD FOR FURTHER ADVANCEMENT, PROMOTIONS, ! PAY INCREASES. PLAINTIFF'S STELLAR REPUTATION IS RUINED IN THE COMMUNITY.

CONCLUSION

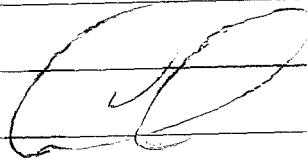
THE DEFENDANTS MEET ALL ELEMENTS OF DEFAMATION OF CHARACTER. THE DEFENDANTS KNOWINGLY PUBLISHED FALSE STATEMENTS THAT ARE DEFAMING TO THE PLAINTIFF. THE STATEMENTS WERE MADE WITH RECKLESS DISREGARD FOR THE TRUTH. THEIR SOLE PURPOSE WAS TO CONCEAL THEIR MISHKINS FRUITS AND TO HARASS, INTIMIDATE, EMBARRAS, AND SLANDER MR. GORDON. THIS RESULTED IN MR. GORDON'S CHARACTER ! REPUTATION HAVE BEEN INJURED BY THESE FALSE ALLEGATIONS.

THE DEFENDANTS NOW HAVE THE BURDEN OF PROVING THE TRUTH OF THEIR DEFAMATORY STATEMENTS.

RELIEF PRAYERS

- 1) PLAINTIFF BE AWARDED \$ 25,000,000.00 USD  
(TWENTY FIVE MILLION USD DOLLARS) IN DAMAGES
- 2) SANCTION IMPOSED ON MR. HORTON (REFERRED TO  
DISCIPLINARY BOARD FOR PROFESSIONAL RESPONSIBILITY)
- 3) PLAINTIFF AWARDED ALL PLAINTIFF'S COST, FEES, ATTORNEY FEES,  
DISCRETIONARY COST & FEES
- 4) FOR ALL OTHER RELIEF DEEM PROPER.

RESPECTFULLY,



ROBERT C. GOPSTEIN

## VERIFICATION

STATE OF TENNESSEE

COUNTY OF DUNNISON

COLE GORDON, AFTER FIRST BEING DULY SWORN, MAKES OATH THAT  
THE STATEMENTS CONTAINED IN HIS FORGOING "COMPLAINT" ARE  
TRUE TO THE BEST OF HIS KNOWLEDGE, INFORMATION, AND  
BELIEF AND THAT HE BRINGS THIS PETITION NOT OUT OF  
LEVITY OR BY COLLUSION WITH THE DEFENDANTS, BUT IN  
SINCERITY AND TRUTH, AND FOR THE CAUSES MENTIONED THEREIN

Al

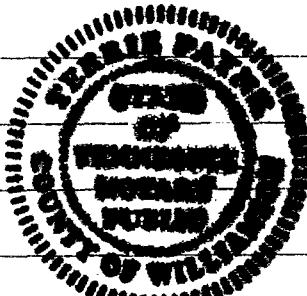
ROBERT GORDON

Sworn to and subscribed before me on this 23 day of October

*Terrie Payne*

NOTARY PUBLIC

my commission expires 2/14/2022



ROBERT C GORDON  
408 CENTRAL ST  
#65920

FRANKLIN, TN 37064

Nashville P&E/C 372  
MONOS MAY 2025PM

RECEIVED

MAY 07 2025

US DISTRICT COURT  
MID DIST TENN

US DISTRICT COURT CLERK  
719 CHURCH ST #1300  
NASHVILLE, TN 37203

Having been advised herein, in that  
the inmate referred to the Williamson  
County Sheriff's Office has neither  
complained nor expected this memo  
therefore the complainant does not  
assume responsibility for it, and the  
Williamson County Sheriff's Office

This correspondence is from an inmate in a  
correctional institution. The Williamson  
County Sheriff's Office has neither  
complained nor expected this memo  
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